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August 13, 2020

Via ECF

The Honorable Madeline Cox Arleo
United States District Court Judge
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Legal Capital Group, LLC v. Sean R. Callagy, et al.
Civil Action No.: 2:20-cv-5124

Dear Judge Cox Arleo:

Please be advised that this firm, along with Robert & Robert PLLC, is counsel for the plaintiff Legal Capital Group, LLC ("LCG" or "Plaintiff") in the above-referenced action.

We have conferred with defendants' counsel, Lawrence S. Lustberg, Esq., and Kevin W. Weber, Esq. of Gibbons, P.C., and in light of the parties' interest in exploring a potential resolution of this matter, jointly request that the return date of the pending Motion to Dismiss (ECF No. 14) be adjourned for thirty (30) days, to **October 8, 2020**, and that Plaintiff's time to respond thereto, including any cross-motion, be adjourned accordingly, to **September 24, 2020**. We note that the parties have agreed that further adjournments may be necessary if the parties' settlement discussions are productive. We, of course, will keep the Court advised.

A proposed form of Order is attached.

Should the Court have any questions, please feel free to contact this office.

Respectfully submitted,

/s/ Michael v. Gattoni
MICHAEL V. GATTONI, ESQ.

Cc: Lawrence S. Lustberg, Esq.
Kevin W. Weber, Esq.